

January 15, 2016

Robert Scott, Chairman
c/o Pamela G. Monroe, Administrator
New Hampshire Site Evaluation Committee
21 South Fruit Street, Suite 10
Concord, New Hampshire 03301-2429

pamela.monroe@sec.nh.gov

RE: Docket No. 2015-02 Application of Antrim Wind Energy, LLC for a Certificate of Site and Facility

Dear Chairman Scott,

Attached please find for filing in this matter the Motion to Intervene of Katharine E. Sullivan.

Sincerely,

Katharine E. Sullivan
156 Willard Pond Rd
Antrim, New Hampshire 03440

**STATE OF NEW HAMPSHIRE
SITE EVALUATION COMMITTEE**

RE: Application for a Certificate of Site and Facility)
By Antrim Wind Energy, LLC)
SEC Docket Number 2015-02)

MOTION TO INTERVENE PRO SE OF Katharine E. Sullivan

Pursuant to the New Hampshire Site Evaluation Committee Rules Site 202.11 and RSA 541-A:32, Katharine E. Sullivan hereby move[s] for permission to intervene *pro se* in the above-referenced proceeding. In support of Katharine E. Sullivan's Motion to Intervene, Ms. Sullivan offer[s] the following arguments:

The interest of Katharine E. Sullivan in the matter of the construction of an industrial wind facility is that I [Katharine Sullivan] live within the boundaries of the Willard Pond/dePierrefeu Sanctuary. This is a place where people come all year round for the beauty and peace of the area, not to stare at 400'+ towers that create a visual, auditory and aesthetic disturbance, not to be underestimated. This area is an inappropriate site for other reasons I will be happy to go into if I am granted intervenor status.

The interest of Katharine E. Sullivan are not being met or heard by the town administration of Antrim, so I wish to have a separate voice from the selectmen who share a more corporate and monetary view of this project.

In exercising its discretion, I respectfully ask that the Committee consider whether the party's interest will be adequately protected by other parties. Since I, as [a] resident[of the Willard Pond Sanctuary of Antrim where the proposed wind facility would be constructed, are concerned that our interests have been fairly addressed thus far by the Town Boards of Antrim, I do not believe that any other party to this proceeding can adequately represent my interests in proceedings before the Committee.

- The intervention of Katharine E. Sullivan will be in the interest of justice and will not impair the orderly and prompt conduct of the proceedings by allowing the intervention.**

[I we] petitioned for and were granted Intervenor status in Antrim Wind Energy, LLC's prior cases before the Committee (SEC Dockets 2011-02, 2012-01, and 2014-05) and as such understand and respect the hearing process.

Pursuant to the SEC Order of December 4, 2015, [name] file[s] this Motion to Intervene by the deadline set forth by the Committee for Docket 2015-02 and requests that [I we] be permitted to intervene with full standing to participate in all phases and activities of the proceeding. [I We] respect the importance of conducting this proceeding in an orderly manner that will not unduly delay the Committee or the parties in reaching an outcome. [I We] are prepared to work closely with other parties to the proceeding in the interest of maintaining order and respectfully offer that [my our] participation, if permitted, would be in the interest of justice.

Dated this 15day of January, 2016.

Respectfully submitted,

Katharine E. Sullivan

Katharine E. Sullivan
156 Willard Pond Rd
Antrim, NH 03440
603 525 4611
